

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

<p>JESSE HERRICK, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3181</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>ROBERT CARLSON, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3184</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>CAREY M. BALLARD, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3185</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>JENNIFER HEGARTY, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3186</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>AMANDA BEASLEY, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3187</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>MICHAEL VARLOTTA, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3188</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>DYLAN HOLLENKAMP, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3189</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>WILLIAM SPEARMAN, BRITTNI LINN, JESSICA ALEXANDER, CHRISTOPHER SANGMEISTER, TAYLOR VETTER, NICHOLE ALLOCCA, KAYLI LAZARD, and BRIDGET CAHILL, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3191</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>BARBARA MILLER, on behalf of herself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3193</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>FRANCINE SIMMONS, individually and on behalf all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3194</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>ANTONIA BIRD, individually, and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3195</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>VERONICA JOAQUIN-TORRES, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3196</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>KENNEDY FREEMAN, and AARON MORRIS, Individually, and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3197</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>MIA SAYERS and KYLEE WILLIAMS, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3203</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>PAMELA BUMP, MELISSA CHARBONNEAU, DOUGLAS CONLEY, NOAH HELVEY, DALLIN ILER, DUSTIN JONES, DEVINNE PETERSON, JUSTIN RANDALL, SOFIA RODRIGUEZ, and RACHEL WOODS, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3204</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>CHRISTOPHER CORDARO, Individually, and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3207</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>RYAN GAMEN, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3209</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>HUNTER FREELAND, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3211</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>MAX EICHENBLATT, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3227</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>NEIL KITZLER, an individual, and on behalf of classes of similarly situated individuals,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC, a Nebraska Limited Liability Company, and DOES 1 to 10, inclusive,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 4:22-cv-3241</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>ANTHONY QUINN, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>EDFINANCIAL SERVICES, LLC and NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 8:22-cv-413</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

<p>IAN SCOTT, LESLY CANALES, ERIC POLANCO, JOSHUA SANCHEZ, and DELILAH OLIVEIRA, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3259</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>
<p>GARNER KOHRELL, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NELNET SERVICING, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:22-cv-3267</p> <p>The Honorable John M. Gerrard, U.S.D.J. The Honorable Cheryl R. Zwart, U.S.M.J.</p> <p>CLASS ACTION</p>

**DECLARATION OF GARY M. KLINGER IN SUPPORT OF PLAINTIFFS' MOTION
TO CONSOLIDATE PURSUANT TO FED. R. CIV. P. 42(a) AND FOR APPOINTMENT
OF INTERIM CO-LEAD COUNSEL PURSUANT TO FED. R. CIV. P. 23(g)(3)**

I, Gary Klinger, being competent to testify, make the following declaration based on my personal knowledge, and where stated, upon information and belief. I declare:

1. I am a partner in the law firm Milberg Coleman Bryson Phillips Grossman, PLLC (“Milberg”), and am one of the lead attorneys for Plaintiffs Jesse Herrick, Carey M. Ballard, Amanda Beasley, Jennifer Hegarty, and Barbara Miller (“Plaintiffs”) in this matter. I submit this declaration in support of Notice Relating to the Leadership Application of Milberg, Morgan & Morgan & Stueve Siegal Hanson. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. On January of 2023 I spoke with Kate Baxter-Kauf of Lockridge Grindal Nauen P.L.L.P., counsel for the plaintiff in *Kohrell v. Nelnet Servicing, LLC et al*, No. 4:22-CV-03267, (D. Neb.). During the course of our conversation, Ms. Baxter-Kauf indicated that she supports the leadership structure proposed in First Filed Plaintiffs Motion to Consolidate Pursuant to Fed. R. Civ. P. 42 and for Appointment of Interim Co-Lead Counsel Pursuant to Fed. R. Civ. P. 23(g)(3). See ECF Nos. 25-26.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct, and that this declaration was executed in Chicago, IL on this 6th day of January, 2023.

/s/ Gary M. Klinger

Gary Klinger

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**